

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE**

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In Re: Brian Goodman, Sr.

Debtor(s)

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Case No.: 25-10233-KB  
Chapter 13

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**MOTION OF DEBTOR'S COUNSEL TO WITHDRAW**

**NOW COMES** Kathleen E. McKenzie, Esq., Counsel for the Debtor(s), Brian Goodman, Sr., in the above-captioned matter and says:

1. That Attorney Kathleen E. McKenzie, was hired to represent the Debtor, Brian Goodman, Sr. on April 9, 2025.
2. That Attorney McKenzie prepared the Debtor's Chapter 13 Bankruptcy Petition and the Debtor's two Chapter 13 Plans of Reorganization.
3. That Attorney McKenzie appeared and represented the Debtor at the §341 Meeting of Creditors.
4. That Attorney McKenzie prepared and successfully prosecuted an Objection to Claim of purported creditor, Mark Plantier.
5. That Attorney McKenzie has prepared Objections and appeared for hearings on Multiple Motions for Relief from the Automatic Stay on the Debtor's various properties.
6. That Attorney McKenzie has prepared an Objection and appeared at multiple hearings on a Motion to Dismiss case filed by the Chapter 13 Trustee.
7. That subsequent to the above-noted activities, communications between the Debtor and Attorney McKenzie have broken down.
8. That the Debtor has informed Attorney McKenzie, via electronic Mail, that effective immediately he wishes to terminate her employment as Counsel for the Debtor.
9. That the Debtor has informed Attorney McKenzie, via electronic Mail, that effective immediately he is "revoking all authority for [Attorney McKenzie] to act on [the Debtor's] behalf in any capacity..."
10. That Counsel cannot represent a Debtor effectively under these conditions, has been expressly informed that she has no authority to act on behalf of the Debtor, and the Debtor no longer wishes to have her represent him.

11. That Counsel believes that no hearing is necessary in the circumstances as the Debtor has expressly terminated the representation; however if this Honorable Court feels the need for a hearing, Counsel requests that it be expedited as there are pending Motions and Orders that require attention.

**WHEREFORE**, Counsel Respectfully Requests that this Honorable Court:

- A. Grant this Motion to Withdraw; and
- B. For such other and further relief as may be deemed Fair, Just and Equitable.

Respectfully Submitted,  
Kathleen E. McKenzie, Esq.

Dated: December 11, 2025

/s/ Kathleen E. McKenzie, Esq.  
Kathleen E. McKenzie, Esq.  
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